

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

In the Matter of)

Advanced Television Systems)
and Their Impact Upon the)
Existing Television Broadcast)
Service)

MM Docket No. 87-268

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To: The Commission

REPLY COMMENTS
OF
SOUTH CENTRAL COMMUNICATIONS CORPORATION

South Central Communications Corporation ("SCCC") submits hereby its reply comments in the above captioned proceeding. In furtherance thereof, the following is stated.

Preliminary Statement

SCCC has been a family-owned, Commission licensee since 1954.^{1/} Consistent with its long-term dedication to providing meaningful service to the communities within its traditional service area, SCCC was an early entrant into the LPTV arena, having initiated its first LPTV operation in 1989 in response to the Commission's establishment of that service and

^{1/} In addition to the eleven LPTV authorizations noted infra, SCCC presently operates seven radio facilities in Indiana and Tennessee. Its commitment to public service was memorialized in the Review Board's exhaustive description of its exceptional role as a "UHF pioneer" incident to its multi-decade operation of WTVK, Knoxville, TN, in competition with the then-dominant VHF television complex. See Knoxville Broadcasting Corp., 103 FCC2d 669 (1986).

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its related encouragement of new entrants. Thereafter, SCCC has -- at considerable expense and the devotion of its overall capabilities -- provided quite the classic "local" television service which the Commission plainly envisioned in instituting the LPTV service ab initio.^{2/}

Exposition

SCCC is also a member of the Community Broadcasters Association ("CBA") which represents a variety of LPTV operators. SCCC has reviewed the Reply Comments of CBA in this proceeding and fully supports the gravamen of those comments.^{3/} Given its practical and long-term involvement in LPTV operations in the real world, SCCC would offer, in addition, the following observations:

- As a matter of law and basic fairness to both the LPTV industry and the public it serves, the Commission cannot now simply relegate LPTV to oblivion. Yet that is precisely the inevitable result should the Commission persist in effectively ignoring LPTV incident to its otherwise laudable purpose to provide for ATV operations generally.
- The CBA reply comments pose specific and viable alternatives for the reasonable and lawful accommodation of both full power ATV operation and the continued

^{2/} SCCC is currently the licensee/permittee of the following operating LPTV facilities:

Evansville, IN:	WJPS-LP, WIKY-LP, W52AZ, W67CB
Sevierville, TN:	W22AU
Knoxville, TN	WEZK-LP
Nashville, TN:	WRMX-LP, WJDE-LP, W68CG
Louisville, KY:	W49AX
Mt. Vernon, IN:	W66CT

^{3/} SCCC has contributed extensively to the empirical data submitted by CBA reflecting the scope and significance of LPTV operations nationwide.

operation of LPTV stations. It is likely that other procedures and mechanisms may achieve the same goal. The absolutely necessary element, however, is the Commission's good faith commitment reasonably to provide for continued LPTV operations in an ATV environment.

- It is manifest that the Commission can and should now make reasonable provision for continued LPTV operation notwithstanding that service's secondary status in an NTSC context. Whereas that designation may be appropriately invoked to resolve or avoid interference between full power and LPTV NTSC operations in specific instances, it cannot reasonably or lawfully be invoked to preclude LPTV from the opportunity to survive and serve the public in an ATV environment.

As noted above, SCCC has devoted substantial resources and effort to the development of a significant LPTV service. As a function of experience and continuing commitment, it now provides a meaningful and desirable program service to a substantial segment of the viewing public. Whereas SCCC itself would be grandly and unfairly disserved should the Commission now effectively terminate the LPTV service, a far greater loss would obviously be suffered by the public which has come to rely upon not only SCCC's service but the service of some 1,700 LPTV stations throughout the nation. The appendices submitted with the CBA reply comments in this proceeding dramatically demonstrate both the reach of LPTV and the service which would be lost to the public in the event of LPTV's demise.

Conclusion

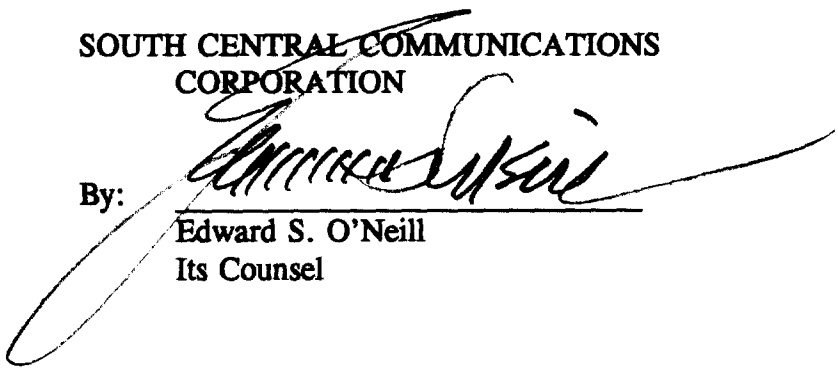
It is clear that the Commission has the means of providing for an environment wherein LPTV is afforded a reasonable opportunity to survive and serve the public consistent

with the healthy development of ATV generally. It is equally clear that it should act to firmly establish that environment as an incident of this proceeding.

Respectfully submitted,

SOUTH CENTRAL COMMUNICATIONS
CORPORATION

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January 16, 1996

Certificate of Service

I, Lois L. Trader, do hereby certify that I have this 16th day of January, 1996, sent by first-class, postage prepaid mail copies of the foregoing "Reply Comments of South Central Communications Corporation" to the following:

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